

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) No. 23-cr-10186-ADB  
 )  
 JAQUORI LYONS, et al. )

MEMORANDUM PURSUANT TO LOCAL RULE 116.5(b) AND MOTION FOR  
EXCLUSION OF TIME UNDER THE SPEEDY TRIAL ACT THROUGH NEXT STATUS  
CONFERENCE

The United States' Attorney, based on communications with counsel for the defendants<sup>1</sup>, hereby submits this status memorandum addressing the issues set forth in Local Rule 116.5(b)(1) through (b)(10).

The parties request that another Interim Status Conference be set in 45-60 days to allow the parties to continue in the discovery process and to prepare for trial. The parties further move that time be excluded under the Speedy Trial Act to the next date set by the Court as the additional time is necessary to review discovery and to prepare for trial.

As of the present date, three defendants have pled guilty. The government is engaged in plea discussions with the great majority of the remaining defendants.

<sup>1</sup> The government has not been able to meet and confer with counsel for defendant Joan Avalo-Quezada.

The government is meeting with counsel for Defendant Finch to review discovery to aid in the defendants' review and preparation for trial this week.

The government is further meeting with counsel for Defendant Ford on August 11, 2025, based on a discovery request.

Counsel for the government has met and conferred with counsel for defendant Riley concerning obtaining transcripts from a prior state trial involving. The two parties are working together to attempt to obtain the transcripts for defendant Riley.

The government is finishing loading two laptop computers with discovery and will forward those computers to the necessary facilities to aid in the review of discovery.

Speedy Trial Act

Time has been excluded under the Speedy Trial Act through August 12, 2025. The parties further move for the exclusion of time under the Speedy Trial Act to the next scheduled Status Conference in the interests of justice given the ongoing discovery process as such time is necessary for the parties to review the extensive discovery, resolve outstanding discovery issues, and prepare for trial. Based upon the nature of the racketeering case, the parties have requested that the case be designated as complex pursuant to 18 U.S.C. §3161(h)(7)(B)(ii).

(b) (1) and (2)

As noted previously, and as discussed at the last Status Conference, the discovery produced to date has been extensive. The defendants are in the process of reviewing the discovery productions and may make additional discovery requests based upon their review.

(b) (3)

The government expects automatic discovery has been completed. Additional discovery may also be necessary based upon requests by the defendants. The government will also supplement automatic discovery with any discovery received from local investigations that are relevant to the RICO conspiracy, including materials that are presently sealed/impounded in prior state cases.

(b) (4)

The parties have finalized a protective order to be used in the production of phone data from seized cellular phones. Additional protective orders will likely be necessary for additional sensitive materials, including materials related to potential cooperators and/or trial witnesses.

(b) (5)

The parties request that motion dates be set at a later Status Conference.

(b) (6)

The parties request that the timing of expert reports be set at a later date due to the complexity of this case and the need to meet and confer as to an appropriate disclosure schedule prior to any trial.

(b) (7)

No defense of insanity, public authority or alibi are expected at this time.

(b) (8)

Time has been excluded through August 12, 2025. The parties further agree, in light of ongoing discovery and the review of discovery by the defendants, that time be excluded until the next Interim Status Conference under the Speedy Trial Act as such time is necessary to properly prepare for trial. As the Court is aware, the parties have requested in the past that the case be declared complex for the purposes of the Speedy Trial Act given the complex nature of the RICO conspiracy charge and the significant amount of discovery associated with the RICO conspiracy charge.

(b) (9)

The government is engaged in substantive plea discussions with the majority of the defendants. Three defendants have pled

guilty. The parties further request that estimated length of a potential trial be provided at a later date to allow the defendants to review discovery regarding the primary RICO conspiracy charge. As noted above, such discovery is extensive. The government may add additional charges, but such charges would not necessitate significant additional discovery.

(b) (10)

The parties request an interim status conference in 45-60 days to allow discovery to continue and the defendants to review the discovery and prepare for trial.

Respectfully submitted,

LEAH B. FOLEY  
United States Attorney

/s/ Michael Crowley  
MICHAEL CROWLEY  
SARAH HOEFLE  
DAVID CUTSHALL  
Assistant U.S. Attorneys

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on the below date.

August 11, 2025

/s/ Michael Crowley

Michael Crowley  
Assistant U.S. Attorney